Purpose:

Many hospitals and other facilities to which residents rotate now require criminal background checks and drug screens of all individuals working, training, or volunteering in their institutions. These include several of the University of Florida College of Medicine - Jacksonville’s educational partners. In addition, application to the Florida Board of Medicine as an intern/resident/fellow/house physician, as well as for unrestricted licensure, requires self-disclosure of criminal convictions and of prior substance abuse and/or treatment.

The University of Florida College of Medicine - Jacksonville (UF COM-J) has established the following policies and procedures to assist in evaluating whether potential residents are eligible to participate in its educational programs. Individuals with a record of criminal activity unsuitable for patient contact, who are not eligible to participate in Medicare, Medicaid, Tricare, or other Federal health care programs, or who may be impaired due to substance abuse, are not eligible for appointment as residents.

Policy:

As a condition of appointment with the UF COM-J as a resident physician, all residents must undergo screening to include:

- A State and Federal criminal background check
- A check of the US Department of Health and Human Services Office of Inspector General (OIG) list of excluded individuals and US General Services Administration (GSA) excluded parties list
- A 12-panel urine drug screen

Procedures:

Criminal background checks

Incoming housestaff (on- and off-cycle) will receive instructions to provide an authorization for a State and Federal criminal background check to be performed by SecurTest with results released to the UF COM-J. The online authorization form will be completed within two weeks of receipt of the appointment packet materials. Incoming residents who will be entering the United States on a visa and do not have social security numbers will have background checks completed by the Department of Homeland Security as part of the visa processing procedure (which includes biometric screening to check each individual against criminal and terrorist databases), and will not be screened by SecurTest.

Completed background checks will be e-mailed to the Associate Dean for Student Affairs (ADSA) and his designee. Any screening with positive results, a SecurTest verification form, rights form, and copy of their criminal history report will be sent to the incoming resident by the ADSA or designee via Federal Express, with instructions for completion should he/she believe that the background check report is erroneous. SecurTest must receive the verification form within five (5) working days of receipt of the form by the incoming resident, and in that case, SecurTest will utilize that additional data to clarify, correct, and/or validate their information.

SecurHomeland is an instant search against over 300 million criminal records covering all 50 states. Instantly reports results from multiple criminal record sources, including department of corrections prison, parole and release files,
Confirmed positive results will be referred to a committee consisting of the Senior Associate Dean for Educational Affairs and Associate Deans for Educational Affairs, with the UFCOM-J Associate General Counsel and UFJHI Director of Human Resources acting in an advisory capacity. This committee will review the results of the check, as well as any corroborating evidence from the Board of Medicine Application, to determine whether the incoming resident should be appointed. Should the committee decide not to appoint, that decision will be communicated to the incoming resident and program director in writing by the Senior Associate Dean for Educational Affairs.

Once an incoming resident’s background check has been cleared, that information will be entered into the appointment database by the ADSA. A copy of the completed screening may be placed in the resident’s personnel file in a sealed envelope and will be saved electronically on the DD.

**OIG/SAM sanctions checks**

Program Administrators are required to provide OEA with verification that the individual’s name has been searched using the OIG and SAM websites. Any incoming resident who has been excluded from participation in Medicare, Medicaid, Tricare or other Federal health care programs may be ineligible for employment and may not be appointed. Should that occur, that information will be communicated to the incoming resident and program director in writing by the Senior Associate Dean for Educational Affairs.

Once an incoming resident’s OIG/GSA sanctions checks have been cleared, that information will be entered into the appointment database. Verification that the resident has been cleared will be included in the attestation form placed in the resident’s personnel file (see Attestations section below).

**Drug Screens**

Incoming housestaff will receive information in their appointment packet that a 12-drug Medical Professional Panel urine drug screen is required as part of their appointment process. Program Administrators enroll each housestaff online and an electronic authorization chain of custody form is e-mailed to the housestaff. Results of the urine drug screen are released to the UFCOM-J Associate Dean of Student Affairs (ADSA) for clearance. This should be completed no later than orientation. Incoming residents who will be entering the United States on a visa must have this screen done as soon as possible after their arrival. Off-cycle residents should have this screen done as soon as possible after they have received the appointment packet.

Completed drug screens will be posted to the password-protected area of the LabCorp e-Results website, and will be reviewed by the ADSA. Any positive results will be compared with medication information provided on the incoming resident’s HAMS form (ADA law prohibits LabCorp from requesting this information as part of the screening process). Any questions regarding positive tests will be reviewed by the ADSA with LabCorp’s Ph.D. toxicology consultants.
Any confirmed positive result for an illegal or non-prescribed substance will render the incoming resident ineligible for appointment, and that information will be communicated in writing to the incoming resident and program director by the Senior Associate Dean for Educational Affairs (SADEA). Positive results for prescribed medications may lead to a PRN referral as part of the medical screening process. Should the incoming resident challenge the results of the drug screen, this information will be forwarded to LabCorp, who will send the sample to another lab (Quest Diagnostics) for re-test (positive samples are retained by LabCorp for one year). The results of that re-test will be considered final.

Once an incoming resident’s drug screen has been cleared, that information will be entered into the appointment database by the ADSA. A copy of the completed screen may be placed in the resident’s personnel file in a sealed envelope and will be saved electronically on the DD.

Attestations

All residents who have been cleared for all requirements will have an attestation form created (merge document autofilled with name and program). This document is located in the Background Checks and Drug Screens folder on the Dean’s Drive. Once signed by the ADSA, the form will be placed in the resident’s personnel file, with a copy included in the appointment packet send to Gainesville, and copies also sent to Baptist Medical Center and Nemours Children’s Clinic.

Residents who may have rotations at Memorial Hospital (Obstetrics and Gynecology, Orthopaedic Surgery, and General Surgery) will have a Memorial attestation form created (merge document autofilled with name, address, and date of birth). This document is located in the Memorial Appt Forms folder on the Dean’s Drive. Once the attestation portion is signed by the ADSA, the resident will complete the HIPAA portion of the form and sign (this will be done for new residents each July as part of the annual compliance package). The completed form will be placed in the resident’s personnel file, with a copy sent to Memorial Hospital.

Access/Disclosure

Results of background checks, OIG/SAM sanctions checks, and drug screens will be available only to UF administrative officials as indicated above for legitimate security purposes. When personnel files are digitized, the sealed envelopes containing background check and drug screen results will be removed. Datasets containing OIG/SAM screening information will also be saved to a confidential folder on the DD.